

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KEITH MURRAY,	:	x
Plaintiff,	:	
-against-	:	
UNITED PARCEL SERVICE OF AMERICA, INC.,	:	
UNITED PARCEL SERVICE, INC., UNITED	:	
PARCEL SERVICE CO., THOMAS CLEARY AND	:	
JILLIAN DEDIER,	:	
Defendants.	:	

STIPULATED PROTECTIVE ORDER

IT IS HEREBY STIPULATED AND AGREED by and among the Parties and their respective Counsel that:

1. Counsel for Defendants United Parcel Service, Inc., United Parcel Service of America, Inc. and United Parcel Service Co. (collectively, "UPS Defendants") agree to disclose to Plaintiff the identity of the "Confidential Informant" (as indicated in UPS Defendants' Supplemental Initial Disclosures) provided that Plaintiff agree that (a) Plaintiff will not reveal the identity of the Confidential Informant to any current or former employees of UPS in deposition or otherwise, and (b) UPS employees currently or formerly employed in the UPS Security Department will not be asked (and will not be required) to identify the Confidential Informant in any deposition or other testimony given in this matter. During the course of any depositions or testimony given by current or former employees of the UPS Security Department, such informant shall be referred to only as the "Confidential Informant." As to depositions or testimony given by UPS employees not currently or formerly employed in the Security Department, Plaintiff may use the Confidential Informant's name (without

revealing or suggesting that such individual is the Confidential Informant) and is free to question the witness with respect to such individual.

2. Plaintiff further agrees not to disclose or otherwise reveal the identity of the Confidential Informant to others outside the scope of the parties to this litigation, and UPS Defendants' disclosure of the Confidential Informant's identity shall be deemed Confidential pursuant to the Confidentiality Agreement and Order signed by the parties on June 11, 2008, and so Ordered by the Court on June 12, 2008.

3. The undersigned hereby consent to the form and substance of this Stipulated Protective Order.

Dated: New York, New York
June ___, 2008

By: _____
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By: _____
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Attorneys for Plaintiff Keith Murray

SO ORDERED:

U.S.D.J.